

**ROBERT G.
GERBER, INC.***Consulting Geotechnical Engineers and Geologists*

17 West Street • Freeport, Maine • 04032-1133

January 27, 1993
File #965Ms. Loukie Lofchie
Brunswick Area Citizens for a Safe Environment
P. O. Box 245
Brunswick, ME 04011

Subject: Review of "Draft Proposed Plan, Sites 5 and 6, Orion Street Asbestos Disposal Site, Sandy Road Rubble and Asbestos Disposal Site", January 1993, Naval Air Station Brunswick, Brunswick, Maine.

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc., has reviewed the "Draft Proposed Plan, Sites 5 and 6, Orion Street Asbestos Disposal Site, Sandy Road Rubble and Asbestos Disposal Site", dated January 1993. The document was prepared by ABB Environmental Services, Inc. (ABB) for the U. S. Department of the Navy for the Naval Air Station Brunswick (NASB), Brunswick, Maine. We had commented on the October 1992 draft of the plan in our letter to you dated November 6, 1992, which you then forwarded to the Navy. The Navy responded to our comments in a letter dated December 10, 1992, from Philip Helgersson (ABB) to James Shafer (Navy). Several issues or questions raised in our November 6th letter have been addressed in the text of the January 1993 version. We have enclosed a copy of our November 6th letter and the Navy's December 10th response for your information. We have also reiterated several of our November 6th comments below where we feel additional information is needed.

In addition, the current document presents a new "preferred alternative" for remediation of both sites. The Navy is now proposing to excavate and transport the materials from Sites 5 and 6 to be placed as subgrade fill beneath the landfill cap at Sites 1 and 3. Once the subject document is issued in draft final form, the Navy will conduct a public comment period from March 29 to April 27, and will hold a public informational meeting and public hearing on April 8, 1993. Both the comment period and the public hearing will provide BACSE with another opportunity to voice their concerns. In addition, written comments on the draft final proposed plan will be accepted if post-marked no later than May 12, 1993 (see comment 3 below).

Our comments on the subject document are as follows:

1. Page 1-2. In our November 6th letter, we asked what assurance BACSE had that wastes other than asbestos were not also disposed of at Site 5, given that the available information

Page 2, Draft Proposed Plan, Sites 5 and 6,
File #965, January 27, 1993

concerning past waste disposal at Site 5 is very limited. We also asked if the site been evaluated for radioactive wastes. The Navy's response is enclosed. Based on our subsequent conversation with Deb Roy of SafeTech Consultants, we are still uncertain if the potential for radioactive hazards at the site (as well as at Site 6) has been adequately assessed. It is our understanding that use of dosimeter badges mentioned by the Navy doesn't necessarily monitor for the entire array of radioactive hazards because some dosimeters are designed to monitor a specific type of radiation. In addition, it is not clear if ABB personnel wore dosimeters when field work was being conducted at Site 5. Therefore, we would ask that the Navy provide additional specific information concerning the type and monitoring capability of the dosimeter badges used by ABB personnel during field investigations at both Sites 5 and 6, and the results of the quarterly testing of these badges.

2. Page 1-5. In their response to our November 6th comment concerning the origin(s) and testing of the soil that is stockpiled at Site 6, the Navy stated that the soil came from various construction sites on base. Soil samples collected from the pile did not contain asbestos. The Navy also said that additional samples from the stockpile would be collected and analyzed during the pre-design activities. Will there be a written site-specific sampling plan available for review and comment? If so, what is the approximate time frame for its preparation and release?
3. Page 2-2. The first sentence of Section 2.2 states that the Navy will conduct a 30-day public comment period from March 29 to April 27. Yet the first sentence in Section 2.3 on page 2-3 states that written comments postmarked no later than May 12, 1993, will be accepted by the Navy. Is the public comment period actually 45 days, rather than 30 days?
4. Page 6-2. The proposed alternative to excavate and move the material from both Sites 5 and 6 to Sites 1 and 3 meets one of BACSE's objectives to consolidate waste at the Base, thereby reducing the number of "sites" unavailable for future use should the Navy ever close the Base. However, there is still concern that asbestos may not be the only contaminant at Sites 5 and 6. In our November 6th letter, we made several comments concerning the uncertainty of the type of wastes disposed of at Site 5 and the need for monitoring should other contaminants (besides asbestos) be identified at Site 5. This was of particular concern because the groundwater at Site 5 has not been tested. The Navy indicated in their December 10th response that if other debris or contaminants are discovered during excavation, it is likely that further remedial action will be warranted. Now that Site 6 will be excavated, rather than left in place with long-term monitoring, we have the same concerns that contaminants other than asbestos may be present at the site. For example, the aircraft parts which allegedly were disposed at Site 6, may be a source of non-asbestos contaminants. What is the Navy's plan for evaluating potential contaminants (other than asbestos) during the excavation at Sites 5 and 6?
5. Page 6-2. Page 6-1 of the December 1992 "Draft Final Proposed Plan, Sites 5 and 6, Orion Street Asbestos Disposal Site, Sandy Road Rubble and Asbestos Disposal Site", states that "Excavation at Site 6 is not considered feasible because the location of waste is not well defined

ROBERT G.
GERBER, INC.

Pag 3, Draft Proposed Plan, Sites 5 and 6,
File #965, January 27, 1993

and health hazards associated with excavation potentially large quantities of asbestos materials." What measures has, or will, the Navy employ to surmount these difficulties? For example, how will airborne asbestos emissions be controlled.

Please do not hesitate to give us a call if you have any questions on the comments above.

Sincerely,
Robert G. Gerber, Inc.

Carolyn A. Lepage
Carolyn A. Lepage, C. G.
Director of Operations



Andrews L. Tolman
Andrews L. Tolman, C. G.
Chief Hydrogeologist

Enc.

ROBERT G.
GERBER, INC.

BRUNINST-PRINT

FILE NO. 1-207-729-0824